

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SMITH KLINE & FRENCH)
LABORATORIES LIMITED and)
SMITHKLINE BEECHAM)
CORPORATION d/b/a)
GLAXOSMITHKLINE,)
)
Plaintiffs,)
v.)
TEVA PHARMACEUTICALS USA, INC.,)
)
Defendant.)

Civil Action No. 05-197-GMS

PUBLIC VERSION

**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS OF DEPOSITION TESTIMONY**

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Dated: February 7, 2007

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**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR BRENDA COSTALL**

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**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR ROGER EDEN**

TEVA COUNTER DESIGNATION	GSK OBJECTION
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91:18-91:22	Foundation
94:21-95:5	Speculation
103:3-103:8	Relevance, completeness designation 103:9-12
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182:20-183:9	Expert, speculation, relevance, completeness designation 183: 10-14
186:16-187:4	Expert, relevance, foundation
248:2-248:10	Relevance, foundation, completeness designation 248:11-15
258:11-258:15	

**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR GREGORY GALLAGHER**

TEVA COUNTER DESIGNATION	GSK OBJECTION
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101:7 - 101:8	Incomplete; Speculation; Vague; Completeness 101:6
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154:15 - 156:9	Speculation; Expert; Vague
178:21 - 180:20	Mischaracterization; Speculation; Foundation
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**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR PETER GIDDINGS**

TEVA COUNTER DESIGNATION	GSK OBJECTION
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124:4 – 125:2	Form; Speculation
128:12 – 129:3	Foundation; Legal conclusion; Speculation; Completeness 127:14-128:10
130:6 – 130:15	Speculation
180:7 – 181:9	Speculation; Foundation; Form
212:6 – 213:19	Relevance

**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR CAROL HARVEY**

TEVA COUNTER DESIGNATION	GSK OBJECTION
55:16-56:7	Speculation, foundation
142:12-142:20	
145:4-145:14	Relevance
183:1-183:18	Speculation, document speaks for itself
184:2-185:6	Speculation

**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR J. PAUL HIEBLE**

TEVA COUNTER DESIGNATION	GSK OBJECTION
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55:1-55:4	
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129:2	Vague, foundation, completeness designation 128:20-22; 129:3
129:4-129:20	Relevance, foundation
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171:2-171:3	Expert
205:21-206:14	Attorney testimony, expert, confusing
212:12-212:14	Expert, lack of foundation, vague, completeness designation 212:15
212:16-212:19	Expert

**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR WILLIAM HUFFMAN**

TEVA COUNTER DESIGNATION	GSK OBJECTION
80:11-80:15	Relevance, Speculation, Foundation

**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR DAVID OWEN**

TEVA COUNTER DESIGNATION	GSK OBJECTION
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88:4-88:13	Calls for speculation
91:11-91:22	Attorney-client, mischaracterizes testimony, calls for speculation, completeness designation 92:1-3
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93:22-94:4	Mischaracterizes testimony, attorney-client, completeness designation 94:5-8
95:9-96:1	Relevance, attorney-client, speculation
110:21-111:3	Speculation, foundation, relevance
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**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR KEVIN REEVES**

TEVA COUNTER DESIGNATION	GSK OBJECTION
53:3-53:11	Vague, calls for expert testimony

**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR SCOTT STOFIK**

TEVA COUNTER DESIGNATION	GSK OBJECTION
195:24-197:12	Relevance

**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR DEBORAH JASKOT**

TEVA COUNTER DESIGNATION	GSK OBJECTION
17:10-17:16	
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**GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS
TO TEVA'S COUNTER DESIGNATIONS FOR ANNE PAYNE**

TEVA COUNTER DESIGNATION	GSK OBJECTION
6:10-6:23	

CERTIFICATE OF SERVICE

I, Patricia Smink Rogowski, hereby certify that on February 15, 2007 [PUBLIC VERSION] GSK'S OBJECTIONS AND COMPLETENESS DESIGNATIONS TO TEVA'S COUNTER DESIGNATIONS OF DEPOSITION TESTIMONY was filed with the Court Clerk using CM/ECF which will send notification of such filing(s) to Josy W. Ingersoll.

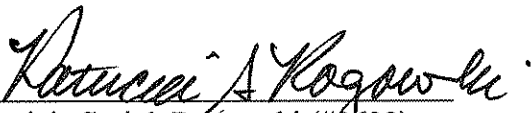
I hereby further certify that on February 15, 2007, I have also served this document on the attorneys of record at the following addresses as indicated:

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